

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

LEONARDO ALMONTE-RAMIREZ

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1:14-CR-00021-JL

ASSENTED TO MOTION TO CONTINUE

Now comes, the defendant who requests that the currently scheduled pretrial and jury selection scheduled for March 26, 2014 and the week of April 1, 2014 be continued to a date after May 19, 2014. This Motion is filed due to undersigned counsel's court schedule in March and April in consultation with the attorney for the government and his schedule.

Undersigned counsel has eleven court appearances and one personal medical appointment scheduled in the first two weeks of April but has no matters currently scheduled between May 19, 2014 and June 9, 2014. One matter is scheduled for June 10, 2014 with no other matters scheduled in June. In addition, counsel for the government has indicated similar difficulties with his schedule including the unavailability of a witness during the first two weeks of April due to said witness' daughter being scheduled for surgery. Finally, certain developments occurred yesterday that increase the chances of successful negotiation.

The defendant and the government also request that the Court enter an order excluding the period of the continuance from the Speedy Trial Act calculations for this case.

Respectfully submitted,

Dated: March 14, 2014

/s/ Charles A. Bookman
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NH BAR# 11399

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the within Motion was this day served upon all counsel of record by electronic notification.

Dated: March 14, 2014

/s/ Charles A. Bookman
Bookman & Al-Marayati